

**THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BARBARA M. GESIAKOWSKI,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 1:20-cv-00656
)	
MORREALE, BRADY, MALONE & CWIK,)	Honorable Judge John Z. Lee
P.C., JOHN F. MORREALE, an individual,)	
and THE LASALLE NETWORK, INC.,)	Honorable Magistrate Jude Maria Valdez
)	
Defendants.)	
)	

**PLAINTIFF’S COMBINED MOTION TO WITHDRAW ATTORNEY AND SEALING OF
DOCKET ENTRY RELEVANT TO THE INITIAL COMPLAINT**

COMES NOW Plaintiff, BARBARA M. GESIAKOWSKI (“Plaintiff” or “Gesiakowski”) by and through her attorneys, COLE SADKIN, LLC and with respect to her Combined Motion to Withdraw Attorneys and Sealing of Docket Entry Relevant to the Initial Complaint, so states the following:

1. On or about January 29, 2020 the Plaintiff filed her four (4) count complaint against Defendants alleging disability and gender/sex discrimination and harassment during the course of her employment. **[Docket Entry #1]**
2. On or about February 13, 2020, Plaintiff contacted her counsel with respect to the certain personal and confidential health information concerning her specific disability within the Complaint.
3. Thus, Plaintiff was granted leave of this Court in order to file the Amended Complaint with which to remove references to the same in the initial Complaint on file.
4. As a result, Plaintiff filed her amended complaint with this Court on March 4, 2020. **[Docket Entry # 11].**
5. The Federal Rule of Civil Procedure 5.2 (d) states:

(d) Filings Made Under Seal. The court may order that a filing be made under seal

without redaction. The court may later unseal the filing or order the person who made the filing to file a redacted version for the public record.

6. District Courts are encouraged to allow the sealing or redacting of certain “personal” or “confidential” information in pleadings. As the supporting caselaw explained in *Young v. United Parcel Service, Inc.*, Civil Action No. DKC 08-2586 (D. Md. Feb. 14, 2011) held (sealing exhibits containing “both personal employee information and certain sensitive corporate data”)).
7. However, and unfortunately, at this time, there has been a breakdown in attorney-client communication and as such the relationship has reached irreconcilable differences.
8. Therefore counsel and Plaintiff request that the law firm of Cole Sadkin, LLC and all of their appeared attorneys are withdrawn from this matter; and that Plaintiff is allotted the necessary time to secure new representation.
9. Plaintiff’s counsel has sent this Motion to Plaintiff for review, as well as counsel for defendant, The LaSalle Network.
10. Further, in speaking with counsel for The LaSalle Network, counsel has agreed to an unopposed Motion, and requests all current and pending deadlines be vacated and that a status hearing be set in sixty (60) days, on or about May 10, 2020.
11. This Motion is not for the purposes of delay, and with the granting of such relief Defendants would not be prejudiced in anyway.

WHEREFORE, Plaintiff, BARBARA M. GESIAKOWSKI, by and through her counsel, COLE SADKIN, LLC, respectfully requests that this Court grant this Motion and (1) seal, expunge, or redact [Docket Entry # 1, “The Complaint”], (2) withdraw the law firm of Cole Sadkin LLC and its attorneys, and (3) allow Plaintiff sufficient time until May 10, 2020 in order to secure new counsel. Lastly, Plaintiff humbly requests any other such relief,

just, proper, and equitable in the premises.

Dated: March 10, 2020

/s/ Mason S. Cole
Mason S. Cole

COLE SADKIN LLC

Mason S. Cole

Dean J. Tatooles

Vani Vedam

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